

EXHIBIT B

Pages 51-97

Highlighted Comparison of Plaintiffs' Original and
Amended Exhibit List

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	API 52			
1948	"Industrial Work Clothes: Their Provision and Laundering," by Roy Bonsib (Medical Dept./Standard Oil Company). Date: January 28, 1948.			
1949	"Asbestosis," by H. Wyers. (December 1949)			
1959	"Industrial Carcinogens," by R.E. Eckardt. <i>Modern Monographs in Industrial Medicine</i> (1959).			
1960	"Diffuse Pleural Mesothelioma and Asbestos Exposure in the North Western Cape Province," by J.C. Wagner, C.A. Sleggs, et al. <i>Brit. J. Industr. Med.</i> , 17:260 (1960)			
1961	"Diffuse Pleural Mesotheliomas in South Africa," by C.A. Sleggs, et al. <i>South African Medical Journal</i> , Vol. 35 (1961)			
1962	"Die Basaalmetabolisme-Snelheid Van Blanke Mans," by K.C. Holemans. (1962)			
1962	Research Forum, "Mesothelioma of Pleura or Peritoneum and Limited Basal Asbestosis," by J.G. Thomson. <i>S.A. Medical Journal</i> (1962)			
1963	"Dusts, Fumes, and Mists in Industry," Published by National Safety Council (1963)			
1963	"Asbestos as a Modern Urban Hazard," by J.G. Thomson, et al. <i>S.A. Medical Journal</i> (1963)			
1963	"Pulmonary Asbestosis," by Van Die Redaksi. Published in <i>South African Medical Journal</i> , Vol. 37, No. 24. Date: June 15, 1963.			
1964	"Diffuse Mesothelioma and Exposure to Asbestos Dust in the Merseyside Area," by W. Glyn Owen. (1964)			
1965	"Epidemiology of Mesothelial Tumors in the London Area," by Muriel Newhouse. Hilda Thompson. (1965)			
1965	"Mesothelioma of Pleura and Peritoneum Following Exposure to Asbestos in the London Area," by M. Newhouse, H. Thompson. <i>Brit. J. Industr. Med.</i> 22:261 (1965)			
1965	"Pleural Plaques and Asbestos: Further Observations on Endemic and Other Nonoccupational asbestosis." by Raimo Kiviluoto. Published in <i>Annals New York Academy of Sciences</i> (1965).			

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1967	"Mesothelioma and Asbestos Exposure," by Jan Lieben, et al. <i>Arch. Environ. Health</i> - Vol. 14 (April 1967)			
1969	"Fifteen Cases of Pleural Mesothelioma Associated with Occupational Exposure to Asbestos in Victoria," by James Milne. Published in <i>The Medical Journal of Australia</i> . Date: October 4, 1969			
1970	"Mesothelioma and Asbestos on Tyneside, A Pathological and Social Study," by T. Ashcroft, et al. Published in <i>Pneumoconiosis</i> (1970).			
1970	"Epidemiology of Primary Malignant Mesothelial Tumors in Canada," by A.D. McDonald, et al. <i>Cancer</i> (October 1970)			
1970	"The Radiological Manifestations of Malignant Pleural Mesothelioma," by Richard Heller, et al. Date: January 1970.			
1971	"Two Cases of Malignant Mesothelioma after Exposure to Asbestos," by Paul Champion. Date: 1971.			
1971	"Asbestos and Mesothelioma in Scotland, an Epidemiological Study," by J. McEwen, et al. Published in <i>International Archives of Occupational Health</i> . Vol. 28 (1971).			
1972	"Epidemiology of Pleural Mesothelioma in North-Western Italy (Piedmont)," by G.F. Rubino, G. Scansett, A. Donna, and G. Palestro, published in <i>Brit. J. Indust. Med.</i> , 1972, 29, 436-442			
1972	"Carcinogenicity of Amosite Asbestos," by Irving J. Selikoff, et al. Published in <i>Archives of Environmental Health</i> Date: Sept. 1972, Vol. 25			
1974	"Even the families of some workers are endangered by occupational diseases. The hidden plague," by Alan Anderson Jr. <i>New York Times</i> . p. 272 (October 27, 1974)			
1974	"Mesothelioma Register 1967-68," by Morris Greenberg, et al. <i>British Journal of Industrial Medicine</i> , 31:91-104 (1974)			
1975	"Household-Contact Asbestos Neoplastic Risk," by Henry Anderson. <i>Annals New York Academy of Sciences</i> (1975)			

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	1977 "Mesothelioma Possibly Due to Environmental Exposure to Asbestos in Childhood," by K.J. Arul, et al. <i>Int. Arch. Occup. Environ. Hlth.</i> 40:141-143 (1977)			
	1977 "Asbestos and Mesothelioma Incidence in Connecticut," by Leonard Bruckman, et al. Published in <i>Journal of the Air Pollution Control Association</i> , Vol. 27, No. 2 (February 1977)			
	1997 "Malignant Mesothelioma in Women." Roggli, Oury, Moffatt. <i>Anatomic Pathology</i> . 1997.			
	1978 "Malignant Mesothelioma of the Pleura in Barrow-in-Furness," by J.R. Edge and S.L. Choudhury, Published in <i>Thorax</i> , 1978, 33, Vol. 26-30			
	1978 "Familial Mesothelioma After Intense Asbestos Exposure at Home," by Fredrick P. Li. MD., et al. Published in <i>JAMA</i> , Aug. 4. 1978-Vol. No. 5			
	1978 "Non-Occupational Exposure to Asbestos and Malignant Mesothelioma in Females," by Nicholas J. Vianna and Adele K. Polan. Published in <i>The Lancet</i> , May 20, 1978-Vol. 1 for 1978.			
	1979 "Household Exposure to Asbestos and Risk of Subsequent Disease," by Henry Anderson, et al. <i>Dusts and Disease</i> , Edited by Richard Lemen. John Dement. (1979)			
	1980 "Clearance of asbestos bodies from the lung: a personal view," by KJ Arul, et al. Published in the <i>British Journal of Industrial Medicine</i> . 37:273-277 (1980).			
	1980 Case Report from the Thoracic Services Boston University Medical School - "Asbestos-Related Disease from Household Exposure," by Gary Epler, et al. (1980)			
	1980 "Malignant Mesothelioma in North America," by Alison McDonald, et al. Published in <i>Cancer, A Journal of the American Cancer Society</i> . (1980).			
	1980 "Familial Clustering of Malignant Mesothelioma," by Bjorn Risberg, et al. Published in <i>Cancer</i> . Date: May 1, 1980.			
	1980 "Mesothelioma Associated with the Shipbuilding Industry in Coastal Virginia," by Isabel Tagnon, et al. Published in <i>Cancer Research</i> 40:3875-3879. Date: November 1980.			

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1981	"Malignant Mesothelioma With Occupational and Environmental Asbestos Exposure in an Illinois Community Hospital," by Karen M. Wolf, et al. Published in <i>Arch Intern Med</i> , Vol. 147, Dec 1987			
1981	"Prevention of Occupational Cancer-International Symposium," by International Labor Office Geneva, Published in <i>Occupational Safety and Health Series</i> , Vol. No. 46			
1981	"Household Risk With Inorganic Fibers," by Irving J. Selikoff, Published in <i>Bulletin of the New York Academy of Medicine</i> , Second Series, Vol. 57, No. 10, pp. 947-961, Dec 1981			
1983	"Mesothelioma in Pet Dogs Associated with Exposure of Their Owners to Asbestos," by Lawrence Glickman, et al. <i>Environmental Research</i> , 32:305-313 (1983)			
1984	"Pleural Mesothelioma and Neighborhood Asbestos Exposure," by Alf Fischbein, et al. <i>JAMA</i> Vol. 252, No. 1 (July 6, 1984)			
1985	"Asbestos Disease in Family Contacts of Shipyard Workers," by Kaye Kilburn, et al. <i>AJPH</i> Vol. 75, No. 6 (June 1985)			
1986	"Asbestos Diseases and Pulmonary Symptoms and Signs in Shipyard Workers and Their Families in Los Angeles," by Kaye Kilburn, et al. <i>Arch. Intern. Med</i> - Vol 146 (November 1986)			
1987	"Changes on Radiographs of Wives of Workers Exposed to Asbestos," by Lee Sider, et al. Published in <i>Radiology</i> . Date: 1987.			
1987	"Malignant Mesothelioma With Occupational Asbestos Exposure in an Illinois Community Hospital," by Karen M. Wolf, et al. published in <i>Arch Intern Med</i> , Vol. 147, December 1987			
1990	"Malignant Mesothelioma in Young Adults," by Michael Kane, et al. <i>Cancer</i> , Vol. 65 (March 15, 1990)			
1991	"Mesothelioma and non-occupational environmental exposure to asbestos," by C. Magnani, et al. <i>The Lancet</i> Vol. 338 (July 6, 1991)			
1992	"Malignant pleural mesothelioma caused by non-occupational childhood exposure to asbestos," by A. Cazzadori, et al. <i>British Journal of Industrial Medicine</i> . (1992)			

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1994	"A Population of Children at Risk of Exposure to Asbestos in Place," by Philip Landrigan (1994).			
1995	Report to Congress on Workers' Home Contamination Study Conducted Under The Workers' Family Protection Act (29 U.S.C. 671a) (September 1995)			
1998	"Pleural Mesothelioma Dose-Response Relation at Low Levels of Asbestos Exposure in a French Population-based Case-Control Study," by Y. Iwatsubo, et al. <i>American Journal of Epidemiology</i> Vol. 148, No. 2 (1998)			
1999	"Risk Assessment of Lung Cancer and Mesothelioma in People Living near Asbestos-Related Factories in Taiwan," by Ho-Yuan Chang, et al. <i>Archives of Environmental Health</i> Vol. 54, No. 3 (June 1999)			
1999	"Mesothelioma: cases associated with non-occupational and low dose exposures," by Gunnar Hillerdal. <i>Occup. Environ. Med.</i> 56:505-513 (1999)			
2000	"Occupation and Risk of Malignant Pleural Mesothelioma: A Case-Control Study in Spain," by Antonio Agudo, et al. <i>American Journal of Industrial Medicine</i> 37:159-168 (2000)			
2000	"Multicentric study on malignant pleural mesothelioma and non-occupational exposure to asbestos," by Magnani et al. <i>British Journal of Cancer</i> (2000) 83(1): 104-111.			
2001	"Malignant Mesothelioma From Neighborhood Exposure to Anthophyllite Asbestos," by William Rom, et al. <i>Am. J. of Ind. Med</i> 40:211-214 (2001)			
2001 (Jan)	MAS - Work Practice Study, "Secondary Asbestos Exposure From Bystander Work Clothing of Joint Compound Exposure," January 2001.			
2002	"Letter to the Editor RE: Malignant Mesothelioma From Neighborhood Exposure to Anthophyllite Asbestos," by Michael Kottek. <i>Am. J. of Ind. Med</i> 41:514 (2002)			
2003	"Parental occupation at periconception: findings from the United Kingdom Childhood Cancer Study," by PA McKinney, et al. <i>Occup Environ Med</i> 60:901-909 (2003)			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2004	"How Environmental Hazards in Childhood Have Been Discovered: Carcinogens, Teratogens, Neurotoxicants, and Others," by Dr. Robert Miller. <i>Pediatrics</i> , Vol. 113 No. 4. Date: April 2004.		
	2005	"Municipal pleural cancer mortality in Spain," by G. Lopez-Abente, et al. <i>Occup. Environ. Med</i> 62:195-199 (2005)		
	2007	"Mesothelioma: You Do Not Have to Work for it," by Elizabeth Ampleford and Jill Ohar. <i>Diagnostic Cytopathology</i> , Vol. 35, No. 12 (2007)		
		Gasket – Packing Studies		
	1932	Memorandum on the Industrial Diseases of Silicosis and Asbestosis		
	1935	Memorandum on the Industrial Diseases of Silicosis and Asbestosis (WK FSOA 5102)		
	1944 (Dec)	"Practical Approach to Packing of Chemical Pumps," Stanley Lopata (Technical Service Engineer, The Duriron Co). Chemical & Metallurgical Engineering, December 1944. (Also FLO 5026)		
	1958 (Feb)	Article, "Asbestos." Published in American Industrial Hygiene Association Journal, Vol. 19, No. 1, pp. 161-163 (February 1958). Published by The Williams & Wilkins Company.		
	1965	"Occupational & Non- occupational Exposures to Asbestos", Annals of the New York Academy of Sciences, Hueper		
	4/19/1973	Dow Chemicals Environmental Health Report: "Atmospheric Concentration of Asbestos Fibers While Cutting Gaskets." File No. A24-173. Author: R.L. Silverthorne. Date: April 19, 1973.		
	7/9/1976	Caterpillar Tractor Co. correspondence from RT Gies (Industrial Hygienist) to W. Bracken regarding industrial hygiene sampling and evaluation of asbestos. Dated July 9, 1976. Exhibit 18 to the deposition of Eugene Sweeney taken 8/28/08. (CAT 5014)		

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	9/8/1976	Babcock & Wilcox memo to Industrial Hygiene-Asbestos File from S.E. Singleton-Corporate Safety & Health. Subject: "Summary and Conclusions of Asbestos Sampling." Date: September 8, 1976.		
	5/1978	"Asbestos Exposure from Gasket Operations," Liukonen, et al., Occupational and Environmental Health Service, Bremerton, WA May 1978		
	9/21/1978	Industrial Health Foundation, Analytical Laboratory: Results of Fiber Counts		
	1981	Affidavit of James Heffron, June 25, 2012 authenticating exemplar brochure "Garlock Gasketing Materials." Copyright 1980, Rev'd 1981 by Garlock, Inc.		
	1981	Crane MSDS Sheets		
	1981	Authentication Affidavit of George Springs, dated April 11, 2011 for the following documents: (See also JC 5071 & CC 5274)		
		Exhibit 1 - April 15, 1981, Material Safety Data Sheet - Trade Name and Synonyms - 2150 (also JC 5029)		
		Exhibit 2 - December 15, 1981, Material Safety Data Sheet - Crane Packing-Houdaille - Trade Name and Synonyms - 333, Compressed Sheet Packing		
		Exhibit 3 - April 15, 1981, Material Safety Data Sheet - Crane Packing Company - Trade Name and Synonyms - 222		
	1982 (Feb)	DRAFT - Analysis of Fiber Release from Certain Asbestos Products, Draft Final Report, Task 1. Prepared for EPA, February 1982 by Anderson & Farino.		
	1985	Shell Gasket Study		
	10/20/1986	Garlock MSDS Sheet for Gaskets		
	10/10/89	Sutton-Clark Supply, Inc. Material Safety Data Sheet. Identity: Garlock 7735 HH-P-46E. Date prepared: October 10, 1989. (G 5093)		

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	7/1991			
	"Exposure to Asbestos from Asbestos Gaskets," Cheng & McDermott, Appl. Occup. Environ. Hyg., July 1991			
	1992			
	Evaluation of Airborne Asbestos Fiber Levels During Removal and Installation of Valve Gaskets and Packing; McKinney 1992			
	1992			
	Millette, J.R., Brown, R.S., "A Close Examination of the Surfaces of Asbestos Gasket Materials", <u>Microscope</u> , pp. 131- 136, 1992.			
	4/12/93			
	Millette Study - Crane Packing (4-12-93)			
	4/12/93			
	Millette Study - Anchor Sheet (4-12-93)			
	5/12/93			
	Millette Study - Crane Sepco Sheet (5-12-93)			
	9/28/93			
	Millette Study - Crane Sheet (9-28-93)			
	1993			
	Millette, J.R., Mount, M.D., "A Study Determining Asbestos Fiber Release During the Removal of Valve Packing", <u>Appl. Occup. Environ. Hyg.</u> Vol 8 (9), pp. 790- 793, September 1993.			
	1/27/94			
	Millette Study - Gasket Removal Study (1-27-94)			
	3/10/94			
	Millette Study - Durabla Sheet (3-10-94)			
	4/21/94			
	Millette Study - Chesterton Sheet (4-21-94)			
	4/21/94			
	Millette Study - Flexitallic Sheet (4-21-94)			
	8/10/94			
	8/10/94 Federal Register			
	8/10/94			
	8/10/94 Federal Register excerpt re. "When removing gaskets containing ACM..."			
	1995			
	"Releasability of Asbestos Fibers from Asbestos-Containing Gaskets," Millette, et al., EIA Tech. Journal, Fall 1995			
	2/27/95			
	Millette Study - Sweeping After Cutting Gaskets (2-27-95)			
	3/15/95			
	Millette Study - Garlock Tyndall Test (3-15-95)			
	5/25/95			
	Millette Study - John Crane Tyndall Test (5-25-95)			
	5/25/1995			
	VIDEO - John Crane gasket Tapping May 25, 1995 from MVA Scientific Consultants, Dr. James Millette.			
	1996			
	Chapter 6 - "Asbestos-Containing Sheet Gaskets and Packing," published in <u>Asbestos Health Risks</u> , Vol. 12 of the Sourcebook on Asbestos Diseases. Edited by: George & Barbara Peters (2006).			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	1997 MAS Work Practice Study I, "Gasket Removal Study, Scraping and Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: 1997			
	10/25/98 1999 Millette Study - Crane and Garlock (10-25-98) DATA: MAS Work Practice Study II, "Removal and Replacing Valve Packing," Prepared by William E. Longo, Richard Hatfield. Date: November 1999			
	1999 VIDEO: MAS Work Practice Study II, "Removal and Replacing Valve Packing," Prepared by William E. Longo, Richard Hatfield. Date: November 1999			
	1999 DATA: MAS Work Practice Study III, "Removal and Replacing Valve Packing," Prepared by William E. Longo, Richard Hatfield. Date: November 1999			
	1999 DATA: MAS Work Practice Study III, "Removal and Replacing Valve Packing," Prepared by William E. Longo, Richard Hatfield. Date: November 1999			
	2000 DATA: MAS Work Practice Study II, "Gasket Removal, Scraping and Handwire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: April 2000			
	2000 VIDEO: MAS Work Practice Study II, "Gasket Removal Study, Scraping and Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: April 2000			
	2000 DATA: MAS Work Practice Study III, "Gasket Removal, Electric Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: June 2000			
	2000 VIDEO: MAS Work Practice Study III, "Gasket Removal, Electric Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: June 2000			
	2000 "Exposure to Asbestos Arising from Bandsawing Gasket Material," Fowler, Applied Occupational and Environmental Hygiene, 2000			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2001 DATA: MAS Work Practice Study IV, "Gasket Removal, Scraping, Hand Wire Brushing and Electric Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: May 14, 2001.			
	2001 VIDEO: MAS Work Practice Study IV, "Gasket Removal, Scraping, Hand Wire Brushing and Electric Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: May 14, 2001.			
	2001 DATA: MAS Work Practice Study V, "Gasket Removal, Scraping and Electric Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: May 15, 2001.			
	2001 VIDEO: MAS Work Practice Study V, "Gasket Removal, Scraping and Electric Wire Brushing," Prepared by William E. Longo, Richard Hatfield. Date: May 15, 2001.			
	12/7/01 12/7/01 Letter from OSHA to Frank Parker			
	2002 "Fiber Release During the Removal of Asbestos-Containing Gaskets: A Work Practice Simulation," Longo, et al., Applied Occupational and Environmental Hygiene, 2002			
	4/4/03 Millette Study - Sheet Gaskets Incl. Garlock (4-4-03)			
	2003 (Aug) "Gasket selection after asbestos," Rob Haywood. <i>Plant Engineering</i> , pp. 46-48, August 2003.			
	9/30/03 Millette Study (MVA) - Asbestos rope handling (9-30-03)			
	2006 "Removing compressed asbestos fibre gaskets and asbestos rope seals," published by Health and Safety Executive (HSE), September 2006.			
	5/22/06 Fiber Release Testing During Gasket Making, James Millette, 5-22-06			
	5/11/2006 VIDEO - John Crane Gasket Making May 11, 2006 (with Filing) from MVA Scientific Consultants, Dr. James Millette.			
	5/11/2006 VIDEO - John Crane Gasket Making May 11, 2006 from MVA Scientific Consultants, Dr. James Millette.			
	1/25/07 Millette Study - Granite Gasket (1-25-07)			
	1/25/07 Millette Study - Garlock 7228 Gasket (1-25-07)			
	1/25/07 Millette Study - John Crane Packing (1-25-07)			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	OSHA's interpretation, "04/05/2007 - Classification of removal of asbestos-containing gaskets; requirement to conduct removal in a 'glove bag.'" Letter from Richard Fairfax to Drew Garner.			
	4/5/07			
	Millette Study - Durabla Sheet Gasket			
	5/1/07			
	Millette Study - John Crane Packing Style 804			
	5/1/07			
	Millette Study - Armstrong Sheet Gasket Style AN-890			
	5/1/07			
	Millette Study - Garlock Packing Style 233			
	5/1/07			
	OSHA standards re. gasket work practices- Asbestos 1926.1101 (printed from www.osha.gov, 1/30/08)			
	1/30/08			
	MAS - WPS by Dr. William Longo, "Exposure to Airborne Chrysotile and Amphibole Fibers During the Removal of Flange and Bonnet Gaskets: A Work Practice Study," Date: September, 2010. (Also CC 5267)			
	2010 (Sep)			
	"Mesothelioma in an Individual Following Exposure to Crocidolite-containing Gaskets as a Teenager," by Ronald Dodson, Samuel Hammar, Lee Poye. <i>Int. J. Occup Environ Health</i> , 2011; 17:190-194.			
	2011			
	Health & Safety Executive (HSE) a25 Asbestos Essentials, "Removing compressed asbestos fibre (CAF) gaskets and asbestos rope seals."			
	2012			
	Various dates			
	"Table D1. Gasket And Packing Sample Information and Asbestos Content Results; Table D2. Summary of Air Sampling Results For Gasket Activities; Table D3. Summary of Air Sampling Results For Packing Activities" Various dates.			
	Various dates			
	MVA, Inc. - Spiral Wound Gasket Reports (various dates) by Dr. James Millette.			
	"Asbestos-Containing Sheet Gaskets and Packing," Millette, et al, Sourcebook on Asbestos Disease			
	Letter from Hughes at Colt Industries			
	Detection of Amphibole Asbestos in Chrysotile Sheet Gaskets; James L. Hubbard & William E. Longo, PHD			
	Various dates			
	Exemplar box, (25) Glove Bags 24x60"			
	Chapter 2 - "Asbestos Analysis Methods," James R. Millette.			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Exemplar gasket, "Garlock Blue-Gard, Style 3200, Non-Asbestos, MIL-G-24696B, Thick 1/4." No date. (G-5109)			
	Material Safety Data Sheet - Fel-Pro Incorporated. Fel-Pro Material A-4297. Bates# MAY04-008423-8424. No Date. (JDE 5031)			
	Plaintiff Specific Exhibits			
	Medical Records of Graham Yates			
	Billing Records & Summary of Billing Records			
	Medical Liens			
	"Seaman." - Bureau of Naval Personnel, Navy Training Cours - NAVPERS 10120-E, Revised Edition 1965.			
	Photographs of Plaintiff and Family			
	Steve Hays CV			
	Steve Hays Report and all Related Materials			
	Dr. Eugene Mark CV			
	Dr. Eugene Mark Report and all Related Materials			
	Dr. Arnold Brody CV			
	Dr. Arnold Brody Report and all Related Materials			
	Dr. Arnold Brody slides			
	Social Security Itemized Statement of Earnings			
	Employment Records			
	Deposition transcripts of Graham Yates and all exhibits attached thereto			
	National Vital Statistics Reports, Vol. 58, No. 21 "United States Life Tables, 2006," by Dr. Elizabeth Arias. Date: June 28, 2010.			
	Defendant Company Logos			
	Pictures of Defendant Company headquarters, facilities, and other locations			
	Demonstrative pictures of jobsites			
	Demonstrative pictures of asbestos products before and after use			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Pictures and demonstratives of various tools including scrapers, wire brushes, compressors, tools, etc			
	Any and all discovery responses filed by Defendants in this case or in past cases			
	All documents produced by defendants in this case			
	Any document or deposition used to authenticate exhibits			
	Any and all documents identified in any deposition taken in this case.			
	Any documents used in any deposition designated in this case.			
	Any documents attached to a Motion for Summary Judgment, Response or Pleading in this case.			
	All exhibits attached to transcripts designated or being designated in this case including all former employees and persons most knowledgeable			
	Exemplars of Defendants' products, tools and/or equipment			
	DEFENDANT SPECIFIC EXHIBITS			
	BENDIX (HONEYWELL)			
	Industrial Hygiene Digest, April 1941. (IHF 142).			
BX 5057	1941			
BX 5080	1957 (May)			
	Article: Capital Close-Ups by Bert Mills in May 1957 edition of <i>Motor Magazine</i> .			
BX 5079	1960 (Dec)			
	Advertisement: Give Your Customers "New Car Safety" Bendix Brake Linings dated December, 1960.			
BX 507	1965			
BX 5060	1966			
	1965 Annual Financial Letter			
	Memo from E.A. Martin to H. Stolar, et al. Subject: Asbestos, Health Report. Date: October 1966. (<i>Exhibit 3 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>).			
BX 3	9/12/1966			
	Letter dated Sept. 12, 1966, to Noel Hendry from E. A. Martin with enclosure: Article entitled "Asbestos: Awaiting 'Trial.'" (<i>Exhibit 4 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). Authenticated by M. Baumgardner - see BX 5055, dated 1/8/08.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 4	Letter dated Sept. 29, 1966, to E. A. Martin from N. W. Hendry.			
BX 5	Internal memorandum dated October 16, 1966 from E. A. Martin and attached letters to the editor of Chemical Week regarding Dr. Selikoff's report on lung cancer from asbestosis.			
BX 5087	Canadian Johns-Manville Asbestos Limited letter from N.W. Hendry, General Sales Manager, re: new caution label for Chrysotile products. Dated: October 1, 1968.			
BX 5109	Letter from N.W. Hendry, General Sales Manager of Canadian Johns-Manville Asbestos Limited containing Chrysotile Asbestos Fibre Warning. Dated: October 1, 1968.			
BX 6	Letter dated Jan. 7, 1969, to Harry Stolar, Bendix Corp., from H. G. Donovan, Johns-Manville, enclosing position paper on asbestos. (Exhibit 6 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner).			
BX 5061	Letter to F.E. Hassier (Friction Materials Div/Bendix) from E. Drislane. Subject: "Asbestos Study Committee (Friction Materials)" Date: August 2, 1971. (Exhibit 7 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner).			
BX 5062	Minutes of Meeting of the Asbestos Study Committee; dated September 15, 1971. (Exhibit 8 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). SEE ALSO "AB-209."			
BX 423	Friction Materials Standards Institute, Inc. memo dated June 20, 1972, from E.W. Drislane to Members of Asbestos Study Committee regarding OSHA Standard-Position of Industry, NIOSH and Advisory Committee. Attached is a table titled "OSHA Regulations on Asbestos." (Exhibit 9 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). SEE ALSO AB-237.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 5018	8/8/1972 Memorandum from H.G. Donovan to N.W. Hendry, Subject: Bendix Corporation, Southfield, Michigan, Asbestos Health Seminar 8/8/72. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007375 to 007381]. <i>SEE ALSO ABEX 5019.</i>			
BX 13	8/17/1972 Minutes of the meeting of the Asbestos Study Committee, August 17, 1972. (Exhibit 10 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). <i>SEE ALSO AB-177.</i>			
BX 424	8/30/1972 Memo from E.W. Drislane of FMSI to Asbestos Study Committee dated August 30, 1972 re attached Article, "Health Hazards of Asbestos" by J.C. Gilson. (Exhibit 11 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). <i>SEE ALSO AB 242.</i>			
BX 5089	9/8/1972 Memorandum from C.E. Wasmuth, Jr. to J.W. Armstrong re: Asbestos Labeling Requirements. Dated: September 5, 1972.			
BX 21	1973 "Brake and Clutch Emissions Generated During Vehicle Operation," by Jacko, DuCharme & Somers, presented at the Society of Automotive Engineers Meeting, May 14-18, 1973 in Detroit, MI.			
BX 333	1/26/1973 Friction Materials Standards Institute, Inc., Bulletin No. 469, dated January 26, 1973 from E. W. Drislane to Active Members, sub: Additional Background on Asbestos.			
BX 17	2/16/1973 Minutes of the Meeting of the Asbestos Study Committee on February 16, 1973 by E.W. Drislane of FMSI. (Exhibit 14 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). <i>SEE ALSO AB 278.</i>			
BX 5063	1973 Bendix General Bulletin No: G-73-6, Subject: O.S.H.A. Standards - Re: Asbestos. Date: June 1973. (Exhibit 12 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner).			
BX 5070	5/21/1973 "Presentation on Asbestos by Dr. Irving J. Selikoff at American Industrial Hygiene Conference," Boston, MA - May 21, 1973. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007388 to 007402]. <i>See also Abex 5021</i>			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 22	Minutes of the Meeting of the Asbestos Study Committee on June 1, 1973 by E.W. Drislane. (Exhibit 13 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). SEE ALSO AB 280.			
BX 23	Minutes of the annual meeting of the Friction Materials Standards Institute, Inc., June 27 28, 1973. Includes report: <u>Asbestos and the Friction Material Industry.</u> (Exhibit 15 & 16 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). SEE ALSO AB 179.			
BX 5064	Memo to Distribution from W.M. Spurgeon (Bendix). Subject: "Presentation and Correspondence on Asbestos." Date: August 21, 1973. (Exhibit 17 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>).			
BX 24	Internal memorandum dated April 11, 1974 from Denny Crandall to Bob Wiley regarding asbestos position paper. (Exhibit 18 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>).			
BX 25	Article dated April, 1974 from Dennison Crandall, Bendix Public Relations, entitled "Asbestos Health in Brake Linings, A Position Paper." (Exhibit 19 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>).			
BX 5066	Minutes of the Meeting of the Asbestos Study Committee on June 14, 1974 by Drislane. (Exhibit 21 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). SEE ALSO AB-283.			
BX 5076	Correspondence to Asbestos Study Committee on Various Papers Concerning Asbestos (03/10/1975)			
BX 33	Bendix Internal memorandum dated June 11, 1975 to John J. Riopelle from J.W. Armstrong re Dr. Selikoff's Visit to the "Big Three."			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 5067	August 8, 1975, "Current Intelligence Bulletin 5, ASBESTOS, Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies." From J. William Lloyd (Dept. of Health, Education, and Welfare) to "Colleague." (Exhibit 26 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). SEE ALSO ABEX 5013			
BX 5071	Publication of the Asbestos Information Association/North America, Second Annual Industry Government Conference, September 10 11, 1975. (Bates Nos. 01 0205377 532) (Also AIA 59).			
BX 5114	Chilton's Auto Repair Manual 1976. TL 152.C5226 1975, Copy 2. Auto Repair Manual 1976: American Cars from 1969 to 1976. Pages U308 through U321. Dated: November 21, 1975.			
BX 5103	"Health-Hazards of Asbestos—A Review of the Medical Literature." Prepared by Jacob W. Tawiah for the Bendix Corporation Corporate Engineering Staff. Dated: December 11, 1975.			
BX 5006	The Bendix Corporation Corporate Engineering Staff, Health-Hazards of Asbestos-A Review of the Medical Literature, Jacob T. Tawiah. 1/16/76			
BX 34	Bendix Internal memorandum dated January 16, 1976 from J.W. Weil to W.T. Birge and attached article dated December 11, 1975 prepared by Jacob W. Tawiah regarding the health hazards of asbestos- a review of the medical literature. (Exhibits 27 & 28 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>).			
BX 5084	Internal Memorandum from James W. Armstrong to Distribution re: Advance Copy – Asbestos Exposure – Brake Repair. Dated: July 27, 1976.			
BX 495	Memorandum dated August 24, 1976 from F. Holmes to Mr. G.S. Rajhans regarding Bendix Automotive, Argyle Plant visit on August 11, 1976 with attached map.			
BX 5091	Letter from Robert J. Cerullo to Edward Bislane re: Irving J. Selikoff's findings. Dated: September 20, 1976.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 5086	Internal Memorandum from M.G. Jacko to D. Bitondo re: Comments on Paper: Asbestos Exposure during Brake Lining Maintenance and Repair. Dated: September 21, 1976.			
BX 5085	Internal Memorandum from S.K. Rhee to D. Bitondo re: Asbestos Exposure during Brake Lining and Repair by A.N. Rohl et al. Dated: October 7, 1976.			
BX 332	Memo from E.W. Drislane to Asbestos Study Committee dated December 21, 1976 re attached Ballot on Recommended Procedures for Brake Servicing. (Exhibit 23 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). SEE ALSO AB 276.			
BX 40	Article entitled "Recommended Procedures for Reducing Asbestos Dust During Brake Servicing," published in FMSI Brake Lining & Clutch Facing Automotive Data Book, 1977. (Exhibit 30 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). SEE ALSO ABEX 5015.			
BX 37	Minutes of the meeting of the Asbestos Study Committee, March 28, 1977. (Exhibit 29 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). SEE ALSO ABEX 5014.			
BX 496	Internal Memorandum dated May 4, 1977 from J.R. Weber to T. Schaefer, Subject: Semi-Annual Asbestos Monitoring.			
BX 5096	Memo to File. Subject: Asbestos Substitute Materials Meeting. Dated: May 10, 1977.			
BX 497	Letter dated July 5, 1977 from H.M. Nelson to Mr. G. Detenbeck with enclosed letter dated July 21, 1977 from H.M. Nelson to Mr. John D. McCann and Occupational Health Branch Air Quality Assessment Report dated June 27, 1977 from C. Rhodes.			
BX 528	Ontario Ministry of Labour letter dated 7/21/1977 from H.M. Nelson to Mr. John D. McCann, Bendix Company with attached Occupational Health Branch Air Quality Assessment Report dated June 27, 1977 from C. Rhodes for the Bendix Company plant.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 87	Minutes of the meeting of the Asbestos Study Committee, January 19, 1978. (<i>Exhibit 31 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). SEE ALSO ABEX 5016.			
BX 5112	"Questions and Answers about Exposure to Asbestos." National Cancer Institute Office of Cancer Communications. Dated: April 26, 1978.			
BX 5083	Correspondence from P.H.S. Tsang to S.K. Rhee concerning International Conference and Workshop on Health Hazards of Asbestos Exposure. Dated: July 7, 1978			
BX 5090	Internal Memorandum from S.K. Rhee to Distribution re: P. Tsang's Report on International Conference on Health Hazards of Asbestos. Dated: July 26, 1978.			
BX 5110	Bendix Research Laboratories Internal Memorandum from S.K. Rhee to Distribution re: P. Tsang's Report on International Conference on Health Hazards of Asbestos. Dated: July 26, 1978.			
BX 45	Friction Materials Standards Institute, Inc. Minutes of the Asbestos Study Committee, August 3, 1978. (<i>Exhibit 32 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). SEE ALSO AB 195. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007354 to 007361]			
BX 5069	"Friction Materials Work Practices Guide," by Friction Materials Standards Institute, Inc. October 1978. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007362 to 007373]. SEE ALSO ABEX 5018.			
BX 47	Bendix General Bulletin dated March 1, 1979 to All Distributor and Rebuilder Customers with enclosure: Friction Materials Work Practices Guide. Oct. 1978.			
BX 5081	Inter Office Correspondence from W.G. Lange to N.K. Modi concerning Light Truck Lining Suppliers. Dated June 11, 1979.			
BX 5097	Inter Office Correspondence from W.G. Lange to N.K. Modi in reference to Confirming 6-7-79 telephone conversation, re: Light Truck Lining Suppliers and Bendix. Dated: June 11, 1979.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 51	Minutes of the Meeting of the Health and Environmental Affairs Committee on October 25, 1979 written by E.W. Drislane of Friction Materials Standards Institute, Inc. (<i>Exhibit 33 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). SEE ALSO AB 298.			
BX 5078	Internal Memorandum from J.W. Armstrong to DER's, Safety Supervisors & Coordinators and EPA Coordinators concerning Asbestos Control Policy dated March 26, 2010			
BX 5068	EPA/CPSC Workshop on Substitutes for Asbestos, July 14, 1980. "Non-Asbestos Friction Materials by Michael G. Jacko, et al (Bendix Corp.) (<i>Exhibit 34 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). SEE ALSO ABEX 5017.			
BX 60	Defendant Bendix Corporation's Answers to Interrogatories propounded by Plaintiff in the case of Harold B. Gray, Jr. v. Raybestos Manhattan, Inc., No. 80-0053-9 in the United States District Court, District of South Carolina, Charleston Division, October 18, 1982.			
BX 5107	Product fact Sheet for Bendix Friction Materials including Drum Brake Segments and Blocks and Disc Brake Pads. Dated: April, 1984.			
BX 5102	Allied Corporation Health, Safety and Environmental Stewardship. Dated: August 20, 1984.			
BX 5092	Correspondence re: EPA Proposal to Commerce Rulemaking on Asbestos Brakes in reference to December 19, 1984. Dated: March 15, 1985.			
BX 5074	Letter to J.C. Pruneski from C.A. Martin. Subject: Aggressive Actions to Discourage Asbestos. Date: June 19, 1986. Bates # SEG17 00856 - 1700858			
BX 5088	Memorandum from E.L. Rogers to R.J. Perry / F. Schuttenhelm re: Revised OSHA Asbestos Label. Dated: July 31, 1986.			
BX 5093	Letter to Asbestos Litigation Group Members from Bruce L. Ahnfeldt re: Ford Motor Co.'s Brake Assembly and Lining Suppliers. Dated: March 11, 1987.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 5095	Internal Memorandum to K.D. Dreschand, Chief re: Asbestos Brake and Clutch Data. Dated: July 23, 1987			
BX 5111	"The Acute Pulmonary Toxicity of Fibrous Materials," Submitted to F.D. Griffith, Ph. D., 3Mm, Saint Paul Minnesota by S.L Gamble, J.W. Clayton. Dated: October 3, 1988.			
BX 5108	Bendix Puts Cancer Warning on Label for all Customers Except Ford and Gm in 1991. Dated: October 10, 1991.			
BX 5106	Correspondence to Frank Kohler, Ralph Freeman, and Jack Schlea re: Asbestos Concerns. Dated: April 13, 1993.			
BX 5098	Defendant Allied Signal Inc.'s objections and Responses to Plaintiffs' Master Interrogatories and Requests for Production. Dated: July 29, 1994.			
BX 5100	AlliedSignal "A Guide to Designing and Manufacturing Environmentally Friendly Products." Dated: July, 1994.			
BX 5101	Memorandum to Design, Manufacturing and Marketing Teams. Cover letter for "Design for the Environment Guide" attachment. Dated September 2, 1994.			
BX 5055	Declaration of Margaret J. Baumgardner, Claims Resolution Management Corporation (CRMC) Research Coordinator (Dated January 8, 2008) authenticating Bendix documents, Bates#CRMC-SEG-002757 to 002769. (Exhibit 5 to Joel Charm depo 08/28/09 in <i>Anderson v. Bara Warner</i>).			
BX 5056	Responses of Honeywell International, Inc. to Standard Interrogatories to Friction Defendants in <i>John Russell, et al v. Alcatel-Lucent Managed Solutions, LLC, et al</i> , No. BC 386030, in the Superior Court, Los Angeles County, California. Date: July 14, 2008.			
BX 5116	Honeywell HSE Management System Level 2 Standard, Industrial Hygiene: Respiratory Protection. Document Owned by Al Shaw, Approved by Evan Van Hook. Issued August 30, 2008. Effective Date May 1, 2009. Standard # HSEMS 373.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 5115	Honeywell HSE Management System Level 2 Standard, Industrial Hygiene: Asbestos. Document Owned by Al Shaw, Approved by Mike Csedrik. Issued September 30, 2010. Effective Date January 31, 2013. Standard # HSEMS 369.			
BX 5082	Honeywell Supplemental Discovery Responses from Williams Mullen. Dated: June 6, 2011.			
BX 5094	Plaintiffs' Memorandum of Law in Support of Instructing the Jury to Find Ford Liable for all Asbestos. <i>Richard Rost v. A.O. Smith Corp., et al.</i> PCCP 1009-1978. Dated: September 20, 2011.			
BX 5099	Plaintiffs' Motion in Limine for the Court to Instruct the Jury to Find Ford Liable for any and all of Plaintiff George Webber's exposures to asbestos from Ford Vehicles because Ford Knew these Vehicles would Contain Asbestos, in <i>George T. Webber v. 3B Products Co., et al</i> PCCP 101201348. Dated: January 3, 2012.			
BX 5104	"Brake Repair Work Can Be Hazardous to Your Health." Center for Science in the Public Interest. No Date.			
BX 5105	"What You Should Know About Asbestos and Health." Worker safety guide. No Date.			
BX 5113	"Asbestos and You," re: Asbestos Dust Hazards. Attachment 2. The Bendix Corporation Executive Offices. No Date.			
BX 5059	Honeywell/Bendix MSDS (Material Safety Data Sheet). Product name: "Cured Organic Segment/Drum Brake - Asbestos." No date.			
BX 5065	Article from the Asbestos Information Association, North American about the AIA. No date. (<i>Exhibit 20 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007383 to 007386]. See also <i>Abex 5020</i>			
BX 59	Brochure entitled "Asbestos and You," published by the Bendix Corp, undated. (<i>Exhibit 22 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>).			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
BX 5072	Exemplar "Bendix Domestic and Import Car Brake Service Manual," Service manual 8-400 by Allied Automotive. No date.			
BX 5073	Bendix Brake System Service Manual, Service Manual 8-200-1B. No Date.			
BX 875	May 12, 1980 Letter			
BX 876	Memo			
BX 877	Position Paper			
BX 878	Memo			
BX 879	Memo			
BX 880	November 28, 1972 Letter			
BX 881	June 22, 2001 email from Gary Stump			
BX 882	September 24, 1986 letter			
	The Troy Record, "Bendix Plant Growing." - No. 259			
	The Time Record, "Marshall Eclipse Division --- Third in a Series." - No. 24			
	The Troy Record, "Bendix Adds \$8 Million to Area's Economy." - 1/29/71.			
	Honeywell International, Inc.'s Notice of Serving Verified Answers to Plaintiffs' Interrogatories - Guilder v. American Honda Motor Co.			
	Exhibit No. 2 to Patrick Sheehan Deposition - "List of Articles."			
	Memo from Dennis Paustenbach to Delores Studier, 12/28/10 - Re: Ford Billing Rates - Proposal from Chemrisk for 2011.			
	In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, 6/2/15 - Order for Sanctions on Exponent by Judge Stephen A. Stobbs			
	In the Circuit Court of the 13th Judicial Circuit in and for Hillsborough County, FL - Ramazetti v. Borg Warner Corp., et al. - Honeywell's Answers to Plaintiff's First Set of Interrogatories.			
	Deposition of Dennis Paustenbach taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Deposition of Mark Garavaglia taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.			
	Deposition of Patrick Sheehan taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.			
	Deposition of Richard Schenkler taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	
		FORD
FD 6017	1941	Industrial Hygiene Digest, April 1941. (IHF 142)
FD 6016	1949	1949 Ford brake manual: "Ford Mechanics Service Forum, Passenger Car Brakes (Step on It!)." Exemplar 1951 "Accident Prevention Manual for Industrial Operations, Second Edition". Copyright National Safety Council, Inc.
FD 6033	1951	Industrial Hygiene Digest, September 1952.
IHF 174	1952	Industrial Hygiene Digest, April 1957.
IHF 187	1957	List of Brake Linings Suppliers, dated October 1, 1958. (Bates 8003 2038).
FD 936	10/1/1958	Bibliography on Carcinogenic Effects of Asbestos or Asbestos Dust, (indexes checked from 1954 November 1965). (Bates 8000 1112 3)
FD 151	1965	Johns Manville advertisement titled "Three distinguished automobiles from Ford Motor Company: all three use Johns Manville disc brake Friction Pads as original equipment, Motor, Southern Automotive Journal / 8230, 1965
FD 28	1965	Johns Manville advertisement titled "How do you stop a heard of wild horses? Ford Motor Company does it with Johns Manville disc brake friction pads." Southern Automotive Journal/#20805, March 1966.
FD 27	1966	Article, "Asbestos Bioeffects Research for Industry," from the Industrial Hygiene Foundation of America, Inc." dated 1966. (Bates 8005 1492 1509).
FD 1488	1966	Autolite Ford Parts Division publication: Shop Tips, 01/00/1969, re Servicing Ford Brake Systems.
FD 75	1969	1971 Ford Car Shop Manual, Date: August 1970.
FD 6030	1970	Article, "Removing Dusts from Brake Assemblies During Vehicle Servicing Alternative Cleaning Methods," by G.L. Lee, from the Annals of Occupational Hygiene, v. 13, dated 1970. (Bates 8006 0754 8).
FD 1603	1970	

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	
FD 547	1970	Letters, Ford, from E.G. Essad to Contracting Officer's Representative, re: forwarding of samples of proposed friction material as alternate to current M151 brake lining, dated February 9, 24, 1970. (Bates 8002 0505 9).
FD 990	1970	Article, "Exposure to Asbestos during Brake Maintenance," by D.E. Hickish, et. al., from Ann. Occup. Hyg., v. 13, p. 17 21, Pergamon Press 1970.
FD 153	1970	Bibliography on Carcinogenic Effects of Asbestos or Asbestos Dust, Supplement I: 1965 July 1970, handwritten notes follow. (Bates 8000 1115 8)
FD 29	1970	Articles from The Annals of Occupational Hygiene, Vol. 13, 1970: D. E. Hickish Exposure to asbestos during brake and clutch maintenance; W. J. Smither Asbestos and asbestosis; S. A. Roach Hygiene standards for asbestos; D. E. Hickish and K. L. Knight Exposure to asbestos during brake maintenance; S. Luxon Technical implementation of the new asbestos regulations; D. Hatch Possible alternatives to asbestos as a friction material; M. L. Bentley Control of the use of asbestos containing friction materials; G. L. Lee Removing dust from brake assemblies during vehicle servicing alternative cleaning methods; K. L. Knight and D. E. Hickish Investigations into alternative forms of control for dust generated during the cleaning of brake assemblies and drums; and S. Luxon Respirators for
FD 252	1/28/1970	Letter, from William R. Pierson, (Chemistry Dept., Ford) to Professor Irving Selikoff, M.D., (Mt. Sinai School of Medicine, CUNY), re: question as to post metamorphosis asbestos toxicity, dated January 28, 1970. (Bates 8000 0032 3).
FD 1a	2/20/1970	Memo, Ford, from Henry B. Lick to J.A. Keller, re: evaluation of asbestos worker exposure in the brake unit, scientific building, dated February 20, 1970. (Bates 8004 0591 2).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 253	Letter, from Irving J. Selikoff, MD, (Mt. Sinai School of Medicine, CUNY) to William R. Pierson (Chemistry Dept., Ford) re: comments on questions regarding brake dust/asbestos, dated February 26, 1970. (Bates 8000 0034 5).
FD 247	Memo, Ford, from Roy L. Gealer, to B.H. Simpson, re: asbestos in brake lining wear debris, dated February 27, 1970., (with attached handwritten calculations). (Bates 8000 0003 18).
FD 1952	Memo, Ford, from J.V. Petrocelli to E.D. Marande, re: Monthly Highlights for March, 1970, Chemical Engineering Department, dated March 23, 1970. (Bates 8007 1027 32).
FD 548	Letters, Ford, from E.G. Essad to Contracting Officer's Representative, re: forwarding of samples of proposed friction material as alternate to current M151 brake lining, dated March 25 1970. (Bates 8002 0510).
Supp FO 5	Gealer, Establish the nature of Particulate Emissions from Brake Lining Wear. Date: April 14, 1970.
FD 549	Letter from E.G. Essad (Ford Product Design Engineer) to Contracting Officer's Representative, re: completion of testing alternate friction linings for M151 Vehicle, dated July 23, 1970. (Bates 8002 0511 2).
FD 248	Memo, Ford, from Roy L. Gealer to B.H. Simpson, re: transmittal of documents relating to asbestos as a health hazard and a product of brake lining wear, dated October 20, 1970. (Bates 8000 0017).
FD 48	Ford Motor Company letter dated November 2, 1970 from Roy L. Gealer, Ph.D., Chemical Engineering Department, Scientific Research Staff To: Mr. Manning, Executive Director-Girl Scouts of Metropolitan Detroit. Michigan (with attachment).
FD 305	Memo, Ford, from R.L. Gealer to A.E. Anderson, et. al. re: visit by Professor Selikoff and William Nicholson to discuss asbestos air problems on November 23, 1970, dated November 13, 1970. (Bates 8000 0311 3).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	
FD 2a	11/16/1970	Memo, Ford, from J.S. Ninomiya, to H.L. Misch, re: Asbestos Emissions from Brake Lining wear, dated November 16, 1970. (Bates 8000 1329 31; 8001 0048 50).
FD 4a	11/19/1971	Memo, Ford, from J.S. Ninomiya to J.U. Damian, re: Fibrous Asbestos Emissions, and health effects, sources, uses, brake lining emission rates, and alternate materials of asbestos, with attached report, dated November 19, 1971. (Bates 8001 0604 29).
FD 599	3/17/1972	Memo, Ford, from C. Mauch, to Contracting Officer's Representative, Special Purpose Vehicles Operations, re: questions arising from grind radius brake interpretations, Taiwan, dated March 17, 1972. (Bates 8002 1623 4).
FD 6035	5/16/1972	May 16, 1972 letter to R.L. Gealer from Cruse Melvin (Ford Technical Services). Subject: Transmission Electron Microscope Determination of Asbestos Emission from Automotive Brake Linings. Bates# FAF0021-0029.
FD 164	7/27/1972	Article, "Brake lining dust linked to cancer asbestos blamed," from The Detroit News, dated July 27, 1972. (Bates 8000 1206).
FD 82	7/28/1972	Memo, Ford, from Serge Gratch to W.D. Compton, re: transmittal of communication by G.F. Bush on asbestos containing materials, relevance to brake linings, chemical engineering, and mechanical research, dated July 28, 1972. (Bates 8000 1562).
FD 883	8/23/1972	Memo, Ford, from G.F. Bush to R. Birdsall, et. al., re: potential future status of asbestos containing materials, dated August 23, 1972. (Bates 8003 1130).
FD 160	12/5/1972	Memo, Ford, from R.L. Gealer to J.E. Mayer, re: Wayne State University experiments on carcinogenic effects of brake dust, including Detroit News article on same, dated December 5, 1972. (Bates 8000 1178 82)
CHR 3	1973	Minutes of the annual meeting of the Friction Materials Standards Institute, Inc., June 27-28, 1973.

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
Supp FO 9	1973 Plant Engineering Office, Manufacturing Staff. Subject: Exposure to Asbestos Fiber Inhalation During Brake and Clutch Inspection and Rebuilding. (1973)
FD 293	1973 Report, "Study of Brake Drum Decomposition Products," September 1972 March 1973. (Bates 8000 0260 1).
FD 180	1973 Publication excerpts, "Industrial Hygiene Digest," December 1973. (Bates 8000 0849 51).
FD 42	1973 Johns Manville, Internal Correspondence dated December 7, 1973 from N. W. Hendry Denver to J. R. M. Hutcheson Jeffrey, subject: Asbestos & Health Presentations. w/list of attendees
FD 750	1/3/1973 Memo, Ford, from J.D. Woods to L.D. Gray, re: asbestos exposure at General Parts Division, Saline Plant, dated January 3, 1973. (Bates 8008 0032).
FD 159	2/6/1973 Memo, Ford, from R.L. Gealer to J.E. Mayer, re: Proposed Wayne State University experiments on carcinogenic effects of brake wear dust, and letter to experiment leader re: estimated brake dust concentrations in urban area, dated February 6, 1973. (Bates 8000 1175 7)
FD 5a	3/7/1973 Memo, Ford, from Henry B. Lick to J.A. Keller, re: Asbestos in Air Sampling Research and Engineering, dated March 7, 1973. (Bates 8004 0661 3).
FD 6044	3/21/1973 Mead letter from E.K. Bancroft to James Niblick (Borg-Warner GM). Subject: OSHA requirements for the handling of asbestos fibers...producing friction paper. Date: March 21, 1973. Bates# MW/Beauchamp.001025-28.
FD 292	4/10/1973 Memo, Ford, from R.L. Gealer to J. Harwood, re: visit to Mt. Sinai School of Medicine re: Ford grant for Asbestos Toxicology research, dated April 10, 1973. (Bates 8000 0258 9).
FD 1160	4/11/1973 Memo, Ford, from J.D. Woods to T.V. McManamon, M.D., re: continued request for institution of OSHA mandated employee medical monitoring program at Saline Plant, dated April 11, 1973. (Bates 8008 0047 8).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	
FD 1002	5/16/1973	Memo, Ford, from Roger L. Wabeke to R.D. Byrom, re: materials available to substitute for asbestos, dated May 16, 1973. (Bates 8004 0728 30; 40).
FD 7	5/25/1973	Handwritten Memo, Ford, from R.A. Bamford to John St. John or Al Turner, re: brake dust collector, possible interest in marketing through Rotunda line, dated May 25, 1973. (Bates 8004 1642 3).
FD 8a	5/29/1973	Memo, Ford, from A.E. Anderson to J.R. Knauss, re: asbestos fiber emissions during brake testing, dated May 29, 1973. (Bates 8004 0979 83).
FD 9a	5/29/1973	Memo, Ford, from Henry B. Lick to J.A. Keller, re: asbestos fiber air sampling at Arizona Proving Grounds, dated May 29, 1973. (Bates 8004 0968 75).
FD 158	7/18/1973	Application package (including correspondence and notes) for grant funding on experiment re: inhalation toxicity of asbestos brake materials, proposed by Dr. Andrew L. Reeves, Ph.D, of Wayne State University School of Medicine, dated July 18, 1973. (Bates 8000 1130 1174)
FD 70	7/21/1973	Department of Health, Education, and Welfare; NDC, NIOSH; Minutes of Occupational Exposures to Asbestos Dust From Brake Linings Meeting of July 21, 1973.
FD 157	7/23/1973	Memo, Ford, from Serge Gratch to W.C. Compton, re: transmittal of Dr. Reeves proposal for brake lining toxicity study, suggested grant of \$5000, dated July 23, 1973. (Bates 8000 1129).
FD 2067	8/23/1973	Memo, Ford, from J.B. Williams to D.J. Merrick, re: Vehicle Brake Rebuilding, discontinuation of compressed air cleaning, dated August 23, 1973. (Bates 8007 1548 50).
FD 156	9/21/1973	Letter, from W. Dale Compton, (VP, Ford) to Dr. Andrew L. Reeves (Wayne State University, School of Medicine), re: rejection of funding for proposed research on inhalation toxicity of asbestos, suggestion for alternate source of funding, dated September 21, 1973. (Bates 8000 1128).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 6015	1974 Excerpt from 1974 Ford brake manual: "Drum and Disc Brakes, Key Points to: Diagnose and Repair Brake Systems."
FD 178	1974 Publication excerpts, "Industrial Hygiene Digest," February 1974. (Bates 8000 0843 4).
FD 43	1974 Johns Manville Environmental Facts/Asbestos, A Condensation of Environmental Facts on Asbestos and Health Presented at a Series of Customer Seminars by Johns Manville Corporation, March, 1974, report was prepared by the Environmental Affairs Department of Johns Manville, in cooperation with the Asbestos Fiber Division, Employee Relations Department and Environmental Engineering.
FD 285	1974 Report, "Brake Drum Decomposition Products Current Research Areas, March 1973 March 1974. (Bates 8000 0245 6).
FD 16a	2/8/1974 Memo, Ford, from Henry B. Lick to J.M. Thomas, re: test results of asbestos emissions from Rotunda Vacuum Cleaner Models F20, F26, and F27, dated February 8, 1974. (Bates 8004 1536 41).
FD 17a	3/8/1974 Memo, Ford, from R.A. Gealer to W.D. Compton, re: Investigation of brake maintenance shop workers dust exposure, by Mt. Sinai School of Medicine, dated March 8, 1974. (Bates 8006 1998 9).
FD 1037	4/30/1974 Memo, Ford, from J.R. Knauss to L. Bates, et. al., re: Controlling Asbestos Exposure, and transmittal of attached asbestos information, dated April 30, 1974. (Bates 8004 0905 10).
Supp FO 12	1975 Management News Bulletin, Automotive Service Industry Association.
FD 54	1975 Ford Motor Company Industrial Relations Bulletin No. 4 titled, Industrial Hygiene, Subject: Asbestos. (1975)
FD 1185	1975 Article, "The Hazards of Asbestos for Brake Mechanics," by Castleman, et. al., from Public Health Reports, May June 1975 vol. 90, no.3. (Bates 8004 1951 3).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 380	Bulletin, "Management News Bulletin," from the Automotive Service Industry Association, re: asbestos health hazards, dated September 1975. (Bates 8001 1134).
FD 380	Bulletin, "Management News Bulletin," from the Automotive Service Industry Association, re: asbestos health hazards, dated September 1975. (Bates 8001 1134).
FD 65	Ford Motor Company interoffice memo dated April 14, 1975 from Roy L. Gealer To: T. Cole Scientific Research Staff; Subject: Exposure of Brake Maintenance Shop Workers to Brake Dust.
FD 275	Notes, Handwritten notes re: UAW called by Dr. Selikoff to safety meeting, dated April 18, 1975. (Bates 8000 0230).
FD 18	Letter from Paul E. Toth to T. Cole. April 23, 1975.
FD 18a	Memo, Ford, from Paul E. Toth to T. Cole, re: exposure of garage mechanics to brake dust, dated April 23, 1975. (Bates 8006 1995).
FD 274	Memo, Ford, from John E. Mayer to T. Cole, re: exposure of brake maintenance shop workers to brake dust, dated April 25, 1975. (Bates 8000 0229). (RELATED TO FD 65)
Supp FO 11	Ford Motor Company letter from Duane Block, MD to Paul Kotin, Johns-Manville Corporation. Date: June 2, 1975.
FD 271	Memo, Ford, from R.L. Gealer to D.R. Coulson, re: SRS research grant to Mt. Sinai School of Medicine, CUNY, dated June 12, 1975. (includes results of clinical tests on 93 garage workers for pulmonary function and blood analysis) (Bates 8000 0211 223)
FD 1205	Memo, Ford, from C.R. Weed to H.B. Lick, re: review of contents of current service manuals for brake dust cautionary statements, with attached shop manual copies, dated July 11, 1975. (Bates 8005 0121 31).
FD 2110	Memo, Ford, from Arthur W. Hanlon to Sidney F. McKenna, re: July 21, 1975 NIOSH Meeting to discuss health problems regarding asbestos exposure, and attached transmittal notes, dated July 15, 1975. (Bates 8008 0160 5).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 1031	FD 1031 Minutes of Meeting on Occupational Exposure to Asbestos Dust from Brake Linings, Dept. of Health, Education, and Welfare, CDC, and NIOSH, dated July 21, 1975. (Bates 8004 0631 7).
FO 13	Memo from J. William Lloyd (Dept. of Health, Education, and Welfare) to Colleague. Date: August 8, 1975
FD 313	Report, "Current Intelligence Bulletin 5, Asbestos: Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies," dated August 8, 1975. (Bates 8001 0035 41).
FD 313	Report, "Current Intelligence Bulletin 5, Asbestos: Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies," dated August 8, 1975. (Bates 8001 0035 41).
FD 382	Memo, Ford, from Paul E. Toth, to C.R. Weed, re: addition of caution statement to brake servicing manual, dated September 4, 1975. (Bates 8001 1139).
FD 6045	Ford memo from D.G. Taggart to D.G. Oberly. Subject: D5AP-7934-AA - 12" Phenolic Reactor to replace PMB-7934-A Aluminum Reactor for C4-FMX. Date: September 10, 1975. Bates# SNYDER000458-60.
FD 1171	Report, re: brake linings, and asbestos, dated September 24, 1975. (Bates 8004 1811 2).
FD 56	Ford Motor Company Technical Service Bulletin No. 99, dated October 24, 1975 Ford Parts and Service Division "Our goal: No unhappy owners."
FD 392	Letter, from R.G. Rossip (Liberty Mutual) re: Ford Dealer Development, exposure to asbestos dust, and recommended procedures. dated December 29, 1975. (Bates 8004 1758 60).
FD 398	Memo, Ford, from Henry B. Lick to S.F. Svoboda, re: transmission of results of asbestos fiber emissions from American Cleaning Corporation vacuum recommend rejection due to emissions in excess of OSHA limits, dated March 9, 1976. (Bates 8001 1170 1).
Supp FO 14	Letter from Arthur Rohl to Dr. Erwin Eichen, Ford Motor Company. Date: March 23, 1976

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 1466	Letter, from John M. Dement (NIOSH) to Roger Wabeke (Ford Motor Company), re: transmittal of attached minutes to March 19, 1976 meeting on Occupational Exposure to Asbestos Dust During Brake and Clutch Servicing, dated May 13, 1976. (Bates 8005 1183 8)
FD 476	Report, "Asbestos Usage," re: outside suppliers of asbestos containing products to Ford, dated April, 1977. (Bates 8001 1653 9).
FD 639	Report, "Asbestos Supplier Compliance with OSHA Regulations," in chart form, dated April 1977. (Bates 8003 1935 9).
FD 250	Memo, Ford, to Dick Kimball, re: Customer Inquiry about asbestos in automobiles, with attached information to be given to Ford Parts and Service, dated January 18, 1977. (Bates 8002 0026 7).
FD 983	Memo, Ford, from Robert S. Dunham to D.G. Oberly, re: OSHA Asbestos standard, dated February 2, 1977. (Bates 8004 0618 9).
FD 983	Memo, Ford, from Robert S. Dunham to D.G. Oberly, re: OSHA Asbestos standard, dated February 2, 1977. (Bates 8004 0618 9).
FD 6046	"Asbestos in Transmission Components," February 21, 1977 (Revised). Bates# SNYDER000319-20.
FD 474	Memo, Ford, from D.P. Cratty to File re: Materials Strategy meeting with Engineering and Research staff to clarify Ford plans for replacing asbestos if OSHA regulations reduce asbestos to .5 fibers/cc, dated May 10, 1977. (Bates 8001 1647 8).
FD 6022	Johns-Manville Internal memo to M. Harris from D.M. Kelleher. Subject: "Asbestos and Health Meetings - Major Customers (G.E., G.M., Ford, Etc.)" Date: July 11, 1977.
FD 468	Memo, Ford, from D.P. Cratty to D.T. Axon, re: Development of Non Asbestos Products, dated July 12, 1977. (Bates 8001 1615).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 273	Letter, from Larry Wartels to Ford Motor Company, re: inquiry for information on substitution of non asbestos materials in the use of brake pads and clutches, with attached note and two way memo with statement on automobile as source of free asbestos, dated November 8, 1977. (Bates 8002 0028 30)
FD 19a	Memo, Ford, from W.A. Goering to C.R. Barbour, re: Health hazards relating to brake lining repair, dated November 15, 1977. (Bates 8001 0001)
FD 351	Article, "Malignant Mesothelioma with Minimal Asbestos Exposure," by Wei jen Chen, MD and N. Karle Mottet, M.D., from Human Pathology, v. 9, n. 3, May 1978. (Bates 8001 0976 81).
FD 1838	File, with transmittal memo from Roger (Wabeke) to Paul (Toth) re: transmittal of info on death of Woodie Thompson, Ford employee, from mesothelioma, dated April 10, 1978. (Bates 8007 0444 86).
FD 359	Memo, from Marjorie A. Weiss, to Donald T. Breen, re: ABC Broadcast on asbestosis, aired July 14, 1978. (Bates 8001 1038).
FD 859	Report, "Review of Toxic and Hazardous Substances," Engineering and Research Subcommittee, prepared by Stationary Source Environmental Control and Engineering Staff, with appendices I VII, dated December 6, 1978. (Bates 8003 0956 86).
FD 417	Report, "Assessment of Asbestos Use and Impending Regulations," Vehicle Materials Development and Planning, August 1979. (Bates 8001 1288 1421).
FD 842	Report, "Occupational Safety and Health Administration (OHSA) Policy for Regulating Workplace Carcinogens," by Employee Health Services, dated October 1979. (Bates 8003 0802 4).
FD 1092	Memo, Ford, from E.H. Valentine, to File, re: safety of asbestos detected in dust, dated February 21, 1979. (Bates 8004 1294).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 449	Memo, Ford, from D.M. McCarthy to E.J. Duda, re: prototype asbestos heat shield, discontinuation of work on same, dated April 3, 1979. (Bates 8001 1559).
FD 76a	Customer Call Report from Calidria Asbestos, Metals Division Salesmen Edward J. Kleber and A.T. Callas (A.T. Callas Co.) to Ford Motor Co. Employees Steve Harvath (Mgr. Product R&D Vinyl); Earl Trent (Supervisor, Prod. Dev. Vinyl); and Bob Cliffler (Chemist Vinyl); re: update of the vinyl plastisol spray (VPS) program, dated April 19, 1979.
FD 363	Memo, Ford, from W.G. Lange to Parakash Jain, re: list of major suppliers for asbestos brake linings for past twenty years, dated June 7, 1979. (Bates 8001 1057).
FD 364	Memo, Ford, from W.G. Lange to N.K. Modi, re: Bendix Friction Materials, brake supplier, dated June 11, 1979. (Bates 8001 1058).
FD 365	Memo, Ford, from W.G. Lange to Neal Greenfield, re: list of asbestos brake suppliers for cars, dated June 21, 1979. (Bates 8001 1059).
FD 45a	Memo, Motor Vehicle Manufacturer's Association of the United States, from Harry B. Weaver to Air Quality Committee, re: EPA, CFC, and Asbestos meeting with John Dekany, EPA, dated August 17, 1979. (Bates 8001 1550 3).
FD 841	Memo, Ford, from J.W. Durstine to D.D. Baker, et. al., re: Response to OSHA regulations and impact on material specifications, dated November 2, 1979. (Bates 8003 0800 1).
FD 840	Memo, Ford, to J.W. Durstine re: Car Engineering Practice Letter Concerning Asbestos, dated November 8, 1979. (Bates 8003 0799).
FD 322	Letter, from A.B.M. Houston, (Compliance and Liaison Manager, Ford) to Joni T. Repasch (EPA, Record Clerk) re: request for "grandfathering," replacement parts, request for minimally adverse impact on asbestos users, dated December 14, 1979. (Bates 8008 0252 3).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 858	Report, "Toxic/Hazardous Substance Control," with numerous attachments, by Personnel and Organization Staff, dated February 8, 1980. (Bates 8003 0915 0955A).
FD 855	Report, "Hazardous Substances," by Organization Planning, Personnel and Organization Staff, dated February 25, 1980. (Bates 8003 0896 906).
FD 920	Memo, Ford, from J.W. Durstine to H.C. McDonald, re: Answers to questions posed at March 7, 1980 hazardous materials meetings, dated March 25, 1980. (Bates 8003 1769).
FD 896b	Memo, Ford, from J.W. Durstine to D.D. Baker, et. al., re: transmittal of draft Report of Task Force Report on Carcinogens in the Workplace (attached), dated May 1, 1980. (Bates 8004 0300 80).
FD 947	Memo, Ford, from S.M. Frey to J.W. Durstine, re: Car Engineering Groups comments to Carcinogens in the Workplace Task Force Draft Report, dated May 8, 1980. (Bates 8004 0236).
FD 956	Memo, Ford, from J.A. Pflug to J.W. Durstine, re: Body and Electrical Product Engineering's comments to Carcinogens in the Workplace Task Force Draft Report, dated May 8, 1980. (Bates 8004 0292).
FD 942	Memo, Ford, from H.A. Nida to G.O. Keutgen re: Metal Stamping Division's comments on Carcinogens Task Force Report, dated May 9, 1980. (Bates 8004 0167).
FD 961	Memo, Ford, from G.E. Adams to J.W. Durstine, re: Chassis Engineering's comments on Carcinogens in the Workplace Task Force Draft Report, dated May 9, 1980. (Bates 8004 0383 6).
FD 944	Memo, Ford, from J.H. Douma to J.W. Durstine re: transmittal of Tractor Operations' Division comments to Carcinogens Task Force (annotated draft report sections attached), dated May 14, 1980. (Bates 8004 0203 7).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 954	Memo, Ford, from D.R. Learned to G.O. Keutgen, re: General Services comments to Carcinogens in the Workplace Task Force Draft Report, dated May 14, 1980. (Bates 8004 0290).
FD 26	Abex Memorandum dated May 13, 1980 from J. J. Brown to J. J. Lukas; re: O.E. Priorities; with handwritten comments of J. Lukas dated 5 15 80. (Bates No. SPNY 005362)
FD 483	Memo, Ford, from R.H. Pyett to R.M. Dierkes, re: omission of Ford Tractor parts from asbestos containing materials list, dated June 4, 1980. (Bates 8001 1700 1).
FD 314	Memo, Ford, from William J. Rooney to A.B.M. Houston, re: transmittal of warning label for brakes/clutch, dated July 8, 1980. (Bates 8001 0042 3).
FD 1943	Memo, Ford, from Mark R. Francis to Arthur S. Tobiasen, re: parts labeling for asbestos containing clutch plates, dated July 9, 1980. (Bates 8007 0955 7).
FD 1132	Memo, Ford, from D.E. Schwenk to M.H. Hamburg, re: EPA/OSHA Asbestos Exposure Program, dated June 1, 1981. (Bates 8004 1609).
FD 5023	Document entitled: FORD MANUFACTURING GUIDELINE, No. G3-19; Subject: Recommended Work Practices for Handling Asbestos. 9/00/81
FD 6013	Ford Manufacturing Guideline, "Recommended Work Practices for Handling Asbestos." Number G3-19. Date: September 1981.
FD 553	Interrogatories, Contents of Ford folder marked, "Zitis/Friedman v. Ford Substantive Information Gleaned from Co Defendant's Responses to Interrogatories," answers of GM and Abex, dated 1981. (Bates 8002 0532 615).
FD 967	Memo, Ford, to "Mary" from "Jack" re: Car Program Direction Letter footnote, transmittal for review, dated August 18, 1981. (Bates 8004 0431 3).
FD 1639	Memo, Ford, from G.F. Bolling to S. Gratch, re: 1982 Advanced Budget Toxic/Hazardous Advisory Group, dated September 24, 1981. (Bates 8006 1745 51).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 834	Memo, Ford, from Bob Husen to L.T. Dixon, et. al., re: notes from Asbestos Information Association (AIA) Meeting, Alexandria, Virginia, September 16, 1981, dated October 6, 1981. (Bates 8003 0760 6).
FD 974	Memo to File, "Asbestos Files," re: Medical Information presented at the Chicago seminar, dated October 15, 1981. (Bates 8004 0534 7).
FD 765	Compilation, "Warnings in Shop Manuals," a review of FoMoCo car and truck shop manuals from 1950 to 1982 containing warnings about asbestos in brake repairs, with attached samples of each warning, report dated 1982. (Bates 8003 0467 86).
FD 126	Letter, From Robert K. Wrede, Esq. (McCutchen, Black, Verleger & Shea) to Marjorie A. Weiss, Esq. (Ford Motor Co.) re: Ford Asbestos Litigation, transmittal of copy of article on asbestos substitutes, from the "UC Clip Sheet," (Cal.). Other articles are included, dated February 10, 1982. (Bates 8002 0009 12).
FD 1502	Memo, Ford, from Alan R. Amberg to J.D. Whyte, re: industrial hygiene study at Kentucky Truck Plant, dated March 18, 1982. (Bates 8005 1637 9).
FD 1615	Letter, from Harold E. Mattes (Training and Publications Dept., Ford) to George Altieri (Helm, Inc.) re: transmittal of asbestos warning information to be included in Shop Manual sets, dated October 18, 1983. (Bates 8006 1180 1).
FD 5776	FD 5776 Health/Safety/Environmental Hazard Information Bulletin No. 83-22 - Asbestos Brake and Clutch Servicing, November 1, 1983.
FD 21	Answers of Defendant Ford Motor Company to Plaintiffs' Interrogatories, Vaughn, et al v. Raymark Industries, Inc., et al USDC, Eastern District of Missouri, Eastern Division, November 9, 1983.

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 23	Deposition of Jack Burl Ridenour, Jr. taken in Vaughn, et al v. Raymark Industries, Inc. USDC, Eastern District of Missouri, Eastern Division on December 9, 1983.
FD 6031	1985 Car Shop Manual, Part I of II, Vol. B, Body Chassis Electrical Date: 1984
FD 6032	1985 Car Shop Manual Body Chassis Electrical, Date: 1984
FD 6	Bulletin, Ford Manufacturing Guideline G3 19, "Recommended Work Practices for Handling Asbestos," dated September 1984. (Bates 8008 0001 5).
Supp FO 18	Defendant Ford Motor Company's Answers to Plaintiffs' First Set of Interrogatories, <u>Pippins v. OCF</u> , Superior Court of the State of California. County of Alameda. February 10, 1984.
FD 2081	Memo, Ford, from Mary Ann Livernois to S.J. Kurtiz, et. al., re: Transmittal of List of Mesothelioma Deaths, dated September 5, 1984. (Bates 8007 1720 6).
FD 22	Response of Ford Motor Company to Plaintiffs' Interrogatories, <u>Bellin v. Ford Motor Company</u> , et al in the Circuit Court of the Judicial Circuit of Florida, in and for Dade County, September 14, 1984.
FD 2253	Ford memo dated October 1, 1984 from P.A. Brogan to E.C. Koops, et al re Industrial Hygiene Survey Of Asbestos Fiber Exposure At Conveyor Loading Of Brake Assembly. [Bates No. 012853 012856]
FD 6034	March 15, 1985 Ford letter to U.S. Environmental Protection Agency (Office of Toxic Substances). Subject: "EPA Proposal to Commence Rulemaking on Asbestos Brakes."
FD 6026	ABEX memo to A.D. Indelicato Winchester from C.A. Martin. Subject: Conversion of Asbestos-Based Materials to Non-Asbestos. Date: March 14, 1986. (Authenticated by deposition of William Buccella, 1/14/10, taken in <i>Randall, et al v. Bondex, et al</i> , No. 62-CV-096373, in the 2nd Judicial District, Ramsey County, Minnesota. Bates # SEG1700868 - 1700870)
FD 25	EPA booklet titled "Guidance for Preventing Asbestos Disease Among Auto Mechanics," EPA-560-OPTS-86-002, June 1986.

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	
FD 6039	1986 (Sept)	Video: "Don't Blow It!" Presented by the U.S. EPA and ALA of Maryland. Produced September 1986.
FD 6040	2/20/1987	February 20, 1987 Ford memo from Roger Wabeke (Industrial Hygiene Section Supervisor) to J.H. Barton and others. Subject: "Exposure of Brake Mechanics to Asbestos Fibers." Endorsing the EPA video "Don't Blow It!" (FD 6039)
FD 6042	7/23/1987	July 23, 1987 Ford letter to K.D. Drachand (CA Air Resources Board, Haagen-Smit Laboratory) from Jerome Amber (Stationary Source Environmental Control Office). Subject: "CARB Asbestos Information Request, Asbestos Brake and Clutch Data."
FD 6021	1990	Ford MSDS Sheet: Ford Motor Company, Brake Lining Kit, Hazardous Materials Information System. Date: July 1990.
FD 6023	1994	Ford Service Technician Specialty Training manual, "Brake systems, General brakes theory and operation, Self-study student reference book." Copyright 1994. "Warning: Many brake linings contain asbestos fibers."
FD 6024	1994	Ford Training Video stills. (1994)
FD 6025	1994	Exemplar: Ford video - 1994 Comprehensive Training Program, "General Brakes Theory and Operation."
FD 6041	2/22/1995	Industrial Relations Bulletin, Industrial Hygiene, Bulletin No. 4, 2/22/95.
FD 6020	1998	Ford MSDS Sheet: Ford Motor Company, Brake Shoe Set, Hazardous Materials Information System. Date: July 1998.
FD 6027	2/8/2005	S/P2 Ford endorsement: "Ford Motor Company Advocates CCAR's 'S/P2' Training to Ford and Lincoln-Mercury Dealers," Date: February 8, 2005.
FD 6028	6/19/2006	S/P2 online course: "Mechanical Pollution Prevention Asbestos," June 19, 2006.
FD 6008	12/11/2006	"Ford Motor Company's Second Supplemental Answers to Plaintiff's Interrogatories to Ford Motor Company Regarding Payment of Consultants," in Uden, et al v. General Motors Corporation, et al, No. 05-6311, 13th Judicial Circuit Court, Hillsborough County, Florida. Date: December 11, 2006.

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 6010	MVA Report of Results: MVA 7380. "Analysis of Ford Brake for Asbestos," by Dr. James Milette. Date: February 19, 2008.
FD 6014	Ford Motor Company's Responses to Plaintiffs' Standard Interrogatories to Friction Defendant Ford Motor Company in <i>John Russell, et al v. Alcatel-Lucent Managed Solutions, LLC, et al</i> , No. BC 386030, in the Superior Court, Los Angeles County, California. Date: May 6, 2008.
FD 6018	"Ford Motor Company's Response to Plaintiffs' Special Interrogatories to Defendant Ford," in Ornstein, et al v. Alfa Laval, Inc., et al, No. BC-388810, in Superior Court, Los Angeles County, California. Date: September 8, 2008.
FD 6047	"Ford Motor Company's Answers to Interrogatories to Defendant Ford Motor Company Regarding Payments to Certain Doctors, Scientists, Authors and/or Organizations," in Ricky Evans v. Union Carbide Corp., et al, No. 1322-CC-00881, in the Circuit Court, St. Louis, MO. Date: March 14, 2014.
FD 6048	2014 (Jun) June 2014, MAS "Hand Sanding of Ford Brake Shoes: A Work Practice Study," William E. Longo, Ph.D. and Michael Mount, CIH.
FD 6012	Exemplar advertisement: "Are We Air-Minded?... " by Ford Motor Company. No date.
FD 1761	Handwritten Note, from Roger (Wabeke) to Paul (Toth) re: transmittal of correspondence concerning studies of employee exposure to tremolite fibrous talc dust, and plant decisions concerning precautions. undated. (Bates 80007 0076).
FD 190	Handwritten Notes, re: articles contained in Annals of the New York Academy of Sciences, vol. 132, art. 1, Biological Effects of Asbestos. undated. (Bates 8000 0939 42).
FD 71	Ford Motor Company, Brake Assembly and Lining Suppliers (Vehicles Assembled by Ford in North America) 1940s 1990s. Bates Nos. 8010 0247 63
FD 264	Report, "Program to Establish the Nature of Particulate Emissions from Brake Lining Wear," undated. (Bates 8000 0169 72).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
FD 286	Bibliography of article "Brake Dynamometer Tests," by A.E. Anderson, R.L. Gealer, R.C. McCune, and J.W. Sprys, undated. (Bates 8002 0031 33).
FD 366	Handwritten List of Articles re: mesothelioma, other asbestos related diseases, undated. (Bates 8001 1061 6).
FD 461	Report, "Asbestosis," by A.J. Lanza, MD, Assistant Medical Director, Metropolitan Life Insurance Company, undated. (Bates 8002 0441 8).
FD 874	FD 874 List, "Suppliers of Asbestos Containing Materials," undated. (Bates 8003 1031).
FD 937b	Part II of a Collection of Title Pages from Asbestos related Articles in the Ford Archives, dated variously. (Bates 8004 0049 94).
FD 937c	Part III of a Collection of Title Pages from Asbestos related Articles in the Ford Archives, dated variously. (Bates 8004 0095 121).
FD 1109	Procedure, "Recommended (Interim) Procedures for Asbestos Brake and Clutch Servicing," undated. (Bates 8004 1430 1).
FD 1761	Handwritten Note, from Roger (Wabeke) to Paul (Toth) re: transmittal of correspondence concerning studies of employee exposure to tremolite fibrous talc dust, and plant decisions concerning precautions. undated. (Bates 80007 0076).
FD 6011 (a-e)	Exemplar: "FoMoCo Genuine Parts and Accessories, Product of Ford Motor Company - Brake Lining Kit C3DZ-2007-B, 1 Kit." No date.
FD 6019	Exemplar: Four enclosures for brake shoes, each in plastic case.
FD 6036	Ford tables regarding X-ray changes in 93 Vehicular Maintenance Workers with over 10 years Experience. No date. Bates# FAFD0000209-211.
FD 6037	Authors notes regarding lung x-ray results (RELATED TO FD 6036). Bates# FAFD0000214-217.

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description		
	FD 6038		Exemplar asbestos warning sticker – 2", "Warning, Some Components on This Vehicle May Contain Asbestos, Refer to Owners Handbook for Further Information." Label No: a97 22256. "WARNING CONTAINS ASBESTOS, Breathing asbestos dust is dangerous to health, Follow safety instructions." No date.
	FD 6043		Pics of a Ford Motor Company 'Rotunda' grinder and authenticating depo of Elbert Luce, 09/28/06 (<i>DeMars v. Allied Signal</i> , et al. In 6th District. Supreme Court, New York).
		8/28/2014	Exhibit No. 2 to Patrick Sheehan Deposition - "List of Articles."
		12/28/2010	Memo from Dennis Paustenbach to Delores Studier, 12/28/10 - Re: Ford Billing Rates - Proposal from ChemRisk for 2011.
		6/2/2015	In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, 6/2/15 - Order for Sanctions on Exponent by Judge Stephen A. Stobbs
			ChemRisk Asbestos Payments Made by Ford from 12/21/11 to 5/24/13
			ChemRisk Asbestos Payments Made by Ford from 12/21/11 to 5/24/13 (By Timekeeper)
			Epilung Asbestos Payments Made by Ford from 12/21/11 to 5/24/13
			Epilung Asbestos Payments Made by Ford from 12/21/11 to 5/24/13 (By Timekeeper)
			Exponent Asbestos Payments Made by Ford from 12/21/11 to 5/24/13
			Exponent Asbestos Payments Made by Ford from 12/21/11 to 5/24/13 (By Timekeeper)
			Epilung Asbestos Payments Made by Ford through 12/21/11 (By Timekeeper)
			Epilung Asbestos Payments Made by Ford from 1/1/01 to 12/21/11
		10/12/2011	Verification by Mark Taylor, 10/12/11 for Supplemental Interrogatories to Defendants Regarding Payments for and on Behalf of Ford Motor Company

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	5/18/2015	Order Re: Plaintiff's Second Motion to Compel Directed to Cardno ChemRisk LLC - In the Circuit for the 3rd Judicial District, Madison County.
			ChemRisk Asbestos Payments Made by Ford from 5/25/13 to 4/21/14.
			"Interdisciplinary Vision: The First 25 Years of the Society for Risk Analysis (SRA), 1980 to 2005." Risk Analysis, Vol. 25, No. 6, 2005 - Thompson, et al.
			Deposition of Dennis Paustenbach taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.
			Deposition of Mark Garavaglia taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.
			Deposition of Patrick Sheehan taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.
			Deposition of Richard Schenkler taken in the Yates case and in In Re: All Litigation Filed by Maune Raichle Hartley French and Mudd, LLC, in the Circuit Court for the 3rd Judicial District Madison County, IL, with exhibits.
			Deposition of Amy Madl taken in <i>Footte v. Borg Warner Corp., et al.</i> (Iowa) to be taken June 18, 2015, with exhibits.
			Deposition of Robert Dolan taken in the Dolan case and all exhibits thereto
			Deposition of Matthew Fyie taken in the Reaser case and all exhibits thereto
			Testimony of Matthew Fyie in the Juni case and all exhibits thereto
			Deposition of Mark Taylor taken in the Burger case and all exhibits thereto

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description
	Deposition of Mark Taylor taken in the Ginter case and all exhibits thereto
	Deposition of Mark Taylor taken in the Russell case and all exhibits thereto
	Deposition of Mark Taylor taken in the Bowman case and all exhibits thereto
	Deposition of Lawrence Roslinski taken in the Guerra case and all exhibits thereto
	Deposition of Victor Sussman taken in the Erhart case and all exhibits thereto
	Victor MSDS Sheets